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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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HBC HAMBURG BULK CARRIERS  
GMBH & CO. KG,

Plaintiffs,

-against-

PROTEINAS Y OLEICOS S.A. DE  
C.V.,

Defendants.

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04 CV 6884 (NRB)

\*\*\*ECF CASE\*\*\*

**REPLY DECLARATION  
IN SUPPORT OF  
MOTION TO VACATE  
ATTACHMENT**

ALEJANDRO BERMUDEZ CABRERA deposes and says:

1. I am President of the Administrative Council of Defendant Proteinas Y Oleicos S. A. de C. V. ("Proteinas") and authorized to make this declaration on Proteinas' behalf. This reply declaration is submitted in support of an application to vacate the maritime attachments of several electronic funds transfers ("EFT") frozen by Citibank and Bank of America.

2. On January 4, 2005, after Proteinas' motion had been filed, Citibank froze two additional EFTs, in the amounts of \$333,414.53 and \$501,551.28. Both of these EFTs were originated by Unilever de Mexico S. de R.L. with Citibank for transfer to Proteinas' bank in Merida, Mexico, BBVA Bancomer Mexico ("Bancomer"), via Bancomer's correspondent bank, JP Morgan Chase Bank in New York. These transfers were to be in payment for purchases of products from Proteinas' plant in Celaya, Guanajuato in Mexico.
3. Proteinas does not have an account in JP Morgan Chase Bank or in Citibank, and Citibank is not the designated correspondent bank for Bancomer. Therefore, Citibank can only have been Unilever de Mexico's bank or its U. S. Dollar account, or the U. S. correspondent of Unilever's Mexican bank.

Pursuant to 28 U. S. C. § 1746 (1), I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed at Merida, Yucatan, Mexico on January 24, 2005.

  
ALEJANDRO BERMUDEZ CABRERA

<b>MEMO FAX</b>		# of pages: 2	date: fecha:
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